

**MOTION GRANTED.**

This case is hereby referred to Magistrate Judge Thomas M. Parker to conduct Mediation as soon as possible before the end of November, 2018, if possible.

/s/ Solomon Oliver, Jr.  
United States District Judge  
10/16/2018

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

TANYA BROWN,  
*Mother and Administrator of the Estate  
of Brandon Jones,*

Plaintiff,

VS.

CITY OF CLEVELAND., *et al.*,

Defendants.

Case No. 1:16-CV-00921

JUDGE SOLOMON OLIVER, JR.

JOINT MOTION FOR REFERRAL  
TO MAGISTRATE JUDGE FOR  
MEDIATION AND FOR A  
STAY OF LITIGATION DATES

Now come the parties, by and through their respective counsel, and hereby move this Honorable Court for an Order referring this matter to the Magistrate Judge for mediation, so that the parties may attempt to resolve this matter through settlement. The parties submit that a stay of litigation deadlines is appropriate, so that time and resources can be dedicated to attempting to resolve this matter.

The parties have completed all fact discovery, and have served expert reports. Currently, the parties have engaged a total of nine (9) experts. Each of these experts have authored a separate report. These experts are located throughout the United States and one expert is located in Alberta, Canada.

Prior to spending significant resources associated with travel, costs, and other expenses associated with the depositions of these experts, which includes taxpayer dollars

on behalf of the Defendants, the parties have agreed to make a good faith effort to resolve this matter. Further, this litigation has included dozens of fact witnesses and extensive written discovery. The parties believe that the best mechanism to attempt to resolve a matter of this complexity and breadth would be through mediation.

Lastly, the current pending litigation dates are an expert discovery deadline and a dispositive motion deadline. The parties propose that in the event this matter is not resolved at mediation, these deadlines be rescheduled by agreement of the parties and subject to final approval by the Court.

Wherefore, the parties move this Honorable Court for a referral of this case to the Magistrate Judge for mediation and a stay of the pending litigation deadlines.

Respectfully Submitted,

/s/ Paul J. Cristallo

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